

**CORBELLO v. DEVITO**  
**CASE NO.: 2:08-cv-00867-RCJ-PAL**

**EXHIBIT 7 TO PLAINTIFF'S MOTION TO COMPEL RE: WRITTEN DISCOVERY  
TO DODGER THEATRICALS LTD AND JB VIVA VEGAS LP  
INJUNCTIVE RELIEF**

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and DODGER THEATRICALS, LTD.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DONNA CORBELLO, an individual  
Plaintiff,

v.

THOMAS GAETANO DEVITO, an  
individual; FRANKIE VALLI, an  
individual; ROBERT J. GUADIO, an  
individual; MARSHALL BRICKMAN,  
an individual; ERIC S. ELICE a/k/a/  
RICK ELICE, an individual; DES  
McANUFF, an individual; DSHT, INC.  
(formerly, "DODGER STAGE  
HOLDING THEATRICALS, INC.), a  
Delaware corporation; and DODGER  
THEATRICALS, LTD., a New York  
corporation,

Defendants.

CASE NO.: 2:08-cv-00867-RCJ-PAL

**DEFENDANTS DODGER  
THEATRICALS, LTD. and  
JB VIVA VEGAS LP'S ANSWERS  
TO PLAINTIFF'S FIRST SET OF  
INTERROGATORIES TO  
DEFENDANT DODGER  
THEATRICALS, LTD. and  
TO JB VIVA VEGAS LP.**

**DT INTERROGATORY NO. 4:**

Identify all documents relating to the payment of any monies, compensation, option payments or royalties to "Owner" (as defined in the *Letter Agreement*) pursuant to the *Letter Agreement*.

**VV Interrogatory No. 12:** Identify all Persons to whom you transfer or pay, or have transferred or paid, any revenues or income generated from the JERSEY BOYS production (s) identified in response to Interrogatory No. 8.

**RESPONSE TO DT INTERROGATORY NO. 4 AND VV INTERROGATORY NO. 12:**

There are numerous redundant documents reporting and evidencing the payments to the Owner and payments to others. The efficient way to convey this information is by drawing from 1099 Statements to Owners and others from Dodger. We have produced 1099's issued so far, reflecting payments to Owner and others. If further documents are needed, along with documents evidencing Defendants' cost and expenses, they will, as discussed, be provided in response to specific reasonable requests. The MCS's produced provide responsive information as well.

**VV. Interrogatory No.4:** Identify all your limited partners.

**Response to VV Interrogatory No. 4:** We will identify all limited partners who are defendants herein. They are: Robert Gaudio, Frankie Valli and DSHT Inc. Otherwise, we object to the disclosure of other limited partners who are solely passive investors in the limited partnership as the request for their disclosure is not reasonably calculated to lead to relevant evidence and it is confidential.

1 Jolla, California, to the present date.

2 **RESPONSE TO INTERROGATORY NO. 39:**

3 See financial documents produced which summarize financial information.


4  
5 **INTERROGATORY NO. 40:**

6 Identify all promotion appearances by any Broadway, touring or other company  
7 of Jersey Boys, live, or in any recorded audio visual medium, including, but not  
8 limited to, television talk show appearance, in which scenes from the play were  
9 performed or reenacted, and identify all documents relating thereto.

10 **RESPONSE TO INTERROGATORY NO. 40:**

11 We have never done a scene from the play in any audiovisual promotional  
12 materials. Promotional audiovisual materials contain some songs from the play, b-roll,  
13 montage underneath music. There might be visual elements from a scene but no  
14 dialogue; No scenes from play were reenacted in promotional materials; just songs.  
15 There is a lead in before a song in a Tony Award performance broadcast which  
16 showed Frankie doing last speech from show as lead in to music.

17  
18  
19  
20 DATED: December\_16, 2009



21 DAVID S. KORZENIK  
22 MILLER KORZENIK SOMMERS LLP  
23 Attorneys for Defendants  
24 FRANKIE VALLI, ROBERT J.  
25 GAUDIO, MARSHALL BRICKMAN,  
26 ERIC S. ELICE, DES McANUFF, DSHT,  
27 INC., DODGER THEATRICALS, LTD.  
28 AND JB VIVA VEGAS L.P.

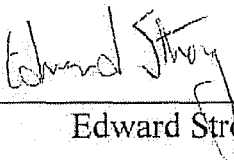
VERIFICATION  
UNDER USC 28 § 1746

I have read the foregoing RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES and know its contents.

I am an officer of a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

I declare under penalty of that the foregoing is true and correct.

Executed on December 16 2009  
New York, New York

  
\_\_\_\_\_  
Edward Strong

I am employed in the County of New York, State of New York. I am over the age of 18 years and not a party to the within action. My business address is **488 Madison Avenue, 11<sup>th</sup> Floor, New York, NY 10022.**

On December 16, 2009, I served the foregoing document described as **DODGER THEATRICALS LTD'S AND JB VIVA VEGAS L.P'S RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES** on the interested parties in this action.

☒ by placing the original and/or a true copy thereof enclosed in (a) sealed envelope(s), addressed as follows:

**SEE ATTACHED SERVICE LIST**

☐ **BY REGULAR MAIL:** I deposited such envelope in the mail at 488 Madison Avenue, New York, NY 10022. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business.

☐ **BY FACSIMILE MACHINE:** I transmitted a true copy of said document(s) by facsimile machine, and no error was reported. Said fax transmission(s) were directed as indicated on the service list.

☐ **BY ELECTRONIC MAIL:** I transmitted a true copy of said document(s) by electronic mail, and no error was reported. Said electronic mail(s) were directed as indicated on the service list.

☐ **BY OVERNIGHT MAIL:** I deposited such documents at the Federal Express Drop Box located at 2049 Century Park East, Suite 3110, Los Angeles, California 90067-3274. The envelope was deposited with delivery fees thereon fully prepaid.

☐ **BY PERSONAL SERVICE:** I caused such envelope(s) to be delivered by hand to the above addressee(s).

Executed on December 16, 2009, New York, NY.

  
Hortensa Thompson

SERVICE LIST

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